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(to be used for all correspondence after initial filing)

Application Number 09/458,858

Filing Date December 10, 1999

First Named Inventor Jamin Pandana

Group Art Unit 2674

Examiner Name X. Wu

Total Number of Pages in This Submission

Attorney Docket Number 861975-0089

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## ENCLOSURES (check all that apply)

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Firm  
or  
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Schulte Roth & Zabel, LLP

Signature

*Reine Glanz*

Date

April 30, 2004

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Brief (12)  
L. Chasr  
5/12/04



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE  
BOARD OF PATENT APPEALS AND INTERFERENCES

Serial No.: 09/458,858  
Assignee: NMB, U.S.A., INC.  
Title: INTEGRATED USB INPUT  
DEVICE  
Appellant: Jamin Pandana  
Filed: December 10, 1999  
Examiner: X. Wu  
Group Art Unit: 2674  
Docket No.: 861975/0089

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REPLY BRIEF (UNDER 37 C.F.R. 1.193)

Appellant replies to the Examiner's Answer dated January 1, 2004.

REPLY TO EXAMINER'S RESPONSE TO ARGUMENT

A. CLAIMS 1, 2 AND 6-13 ARE PATENTABLE OVER POISNER

The USB Controller (32) and AT KB-Controller (30) of Poisner resideS inside the PC, the USB Controller (32) converts all USB signals into PCI Bus, and the AT KB Controller converts the AT/PS2 signals to ISA Bus. Both the ISA or PCI are disposed in the PC and are not in the Keyboard. Furthermore the USB Controller (32) not only to converts the USB signals from Keyboard device, but also converts the USB signals from all other USB devices that will be

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plugged into the same USB Ports later after the USB Keyboard Device is unplugged. Other USB devices can be a USB Printer, USB Memory Card as Storage Device, USB Audio Device, USB Camera Device, USB Smart Card Device, USB Finger Print Device, etc. So, the USB Controller (32) is a Generic USB Controller to convert all the USB signals from different USB devices into PCI Bus.

The USB Low Speed MCU (270) in the present invention is different in that it only converts the keyboard key-actuations, mouse movements/clicker actuation and keyboard LED indications definition to communicate with the PC through USB signals. MCU (270) can not and will not be properly worked with the PCI Bus or other Peripheral USB devices like USB Printer, USB Memory Card as Storage Device, USB Audio Device, USB Camera Device, USB Smart Card Device, USB Finger Print Device etc.

Therefore Poisner's USB Controller (32) and the present invention USB Low Speed MCU Controller (270) are different. Poisner USB Controller (32) has to be placed into the PC and can not be outside the PC, it can be inside the PC as an add-on Card on PCI Bus Connectors. If Poisner USB Controller (32) is placed independently outside the PC, then the Poisner USB Controller (32) is an PCI Bus Device to the PC perspective, or we can call them a "USB to PCI" dongle device.

Furthermore, Poisner USB Controller (32) can not be placed into other USB Peripheral Devices, such as USB Keyboard Device, USB Pointing Device, USB Printer, USB Memory Card as Storage Device, USB Audio Device, USB Camera Device, USB Smart Card Device, USB Finger Print Device, etc. If the Poisner USB Controller (32) is put into USB Peripheral Devices such as USB keyboard Device, USB Pointing Device, etc., then these USB Peripheral

Devices can not be called "USB devices", instead, they are "PCI Bus Device". Figure 1 of Poisner shows that the USB Controller (32) is directly connected to PCI Bus.

**B. CLAIMS 3-5 ARE PATENTABLE OVER POSINER IN VIEW OF BRENDZEL**

Column 2, lines 54-59 of Brendzel teach that the mouse 16 uses a wired or wireless communication links, for wireless link, infrared (IR) and radio frequency (RF) to communicate with the Network 22 and Computer 10 in the art of telephone communications purposes, which is bi-direction communication between mouse and network, and between mouse and computer.

Column 4, lines 36-43 teach mouse 16 used in a conductor to communicate with Computer 10.

Although Figure 1 seems like a mouse 16 wire pass through the keyboard 14, but there is no teaching states that, with wired or wireless links, that the mouse 16 information will pass through keyboard 14, and have keyboard 14 to transmit the mouse information to Computer 10.

Keyboard 14 is only described once on Col.1 line 62, to describe the scenario of Fig. 1. where keyboard 14 communicates with Computer 10, and Column 1, line 67 – Column 2, line 1 states that the mouse 16 communicates with computer 10 using a conductor.

Brendzel teaches that all wired and wireless communication between Mouse 16 and Computer 10 are directly communicated and do not use the microprocessor of other devices to interface the Mouse 16 information to Computer 10.

One embodiment of the present invention shows the Pointing Device using a wireless method, which is infrared (IR) or radio frequency (RF) to communicate with Keyboard in the art of transmitting the X-Y movements and clicker switch information to the Keyboard. The wireless is one direction of communication, from mouse to keyboard. The Mouse contains a wireless transmitter, and the wireless Receiver is embedded in the keyboard to interface to one

USB Low Speed MCU (270), which also interfaces with keyboard key matrix input to communicate with PC.

C. CLAIMS 1, 2 AND 6-13 ARE PATENTABLE OVER POISNER IN VIEW OF DUNCAN

Furthermore, Figure 4 show in Duncan has an interface 23 sending motion data generated to Universal Serial Bus Interface 24, and Interface 26 forwards the keystroke data to Universal Serial Bus Interface 24. The present invention is that both keyboard and pointing device raw data are directly interfaced to USB Low Speed MCU (270) without going through other interfaces for data conversion before the Signals/data reach the USB Controller. The present invention discloses that the keyboard and pointing device use one Interface to reduce costs instead of more than one Interface as Duncan claims.

**CONCLUSION**

For the foregoing reasons, it is respectfully submitted that the Rejections of Claims 1-13 should be reversed.

Respectfully submitted,

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By: \_\_\_\_\_

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Dated: April 30, 2004  
New York, New York